

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	X Chapter 11
CarePoint Health Systems Inc. d/b/a Just Health	: Case No. 24-12534 (JKS)
Foundation, et al., ¹	: (Jointly Administered)
	: :
Debtors.	: :

**FOURTH AMENDED² NOTICE OF AGENDA REGARDING MATTERS SCHEDULED
FOR HEARING ON MARCH 12, 2025 AT 10:00 A.M. (ET)³**

**THIS OMNIBUS HEARING HAS BEEN RESCHEDULED FOR MONDAY,
MARCH 17, 2025 AT 12:00 P.M. AND WILL COMMENCE FOLLOWING THE
CONCLUSION OF THE CONFIRMATION HEARING.**

This proceeding will be conducted **in-person**.

All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Stickles' Chambers Procedures

(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the
hearing unless otherwise noticed using the [eCourtAppearances](#) tool available on the Court's
website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All Amendments are highlighted in **Bold**.

³ All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. CONTINUED MATTERS

1. Motion of the United States Trustee for Entry of an Order Directing the Appointment of a Chapter 11 Trustee, or, in the Alternative, Converting the Cases to Chapter 7 Cases [Filed: 12/09/2024; D.I. [267](#)].

Related Documents:

- A. Joinder of BMC Hospital, LLC to Motion of United States trustee for Entry of an Order Directing the Appointment of a Chapter 11 Trustee, or, in the Alternative, Converting the Cases to Chapter 7 Cases [Filed: 12/30/2024; D.I. [376](#)].

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET). The objection deadline was extended to January 8, 2025 at 4:00 p.m., to February 12, 2025 at 4:00 p.m., to March 6, 2025 at 4 p.m., and again to March 14, 2025 at 4:00 p.m.

Objections/Responses Received:

- B. Declaration of Shamiq Syed Regarding Motion of the United States Trustee [Filed: 01/06/2025; D.I. [397](#)].

Status: This matter has been continued to a date to be determined.

2. Motion of Access Information Management Corporation (I) to Compel (A) Debtors' Assumption of Executory Contracts, or Alternatively, (B) Debtors to Provide Direction as Required by the Contracts and Applicable Law with Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the contracts, (II) For Relief from the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/17/2024; D.I. [320](#)].

Related Documents:

- A. Access Information Management Corporation's Reply in Response to Debtors' Objection to and In Further Support of Its Motion to Compel and for Related Relief [Filed: 02/07/2025; D.I. [660](#)].
- B. Supplement to Motion of Access Information Management Corporation's Motion to Compel [Filed: 02/28/2025; D.I. [781](#)].

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received:

- C. Debtors' Objection To Access Management Information Management Corporation's Motion (I) to Compel (a) Debtors' Assumption of Executory Contracts, or Alternatively, (b) Debtors to Provide Direction as Required by the Contracts and Applicable Law With Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the Contracts, (II) For Relief From the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/31/2024; D.I. [381](#)].

Status: This matter will be continued to the next omnibus hearing date.

II. UNCONTESTED MATTERS WITH CERTIFICATE OF NO OBJECTION (C.N.O.)

- 3.** Debtors' Motion for Order Approving Settlement Pursuant to Fed. R. Bankr. P. 9019 with County of Hudson Regarding Debtors' Participation in County Option Program [Filed: 01/28/2025; D.I. [590](#)].

Related Documents:

- A. Order Limiting Notice with Respect to Debtors' Motion to Approve Settlement Pursuant to Fed. R. Bankr. P. 9019 with County of Hudson Regarding Debtors' Participation in County Option Program [Filed: 02/07/2025; D.I. [659](#)].
- B. Escrow Agreement Related to the County Option Program [Filed: 02/27/2025; D.I. [767](#)].
- C. Certification of No Objection Regarding Motion of the Debtors for an Order Approving Settlement Pursuant to Fed. R. Bankr. P. 9019 with County of Hudson Regarding Debtors' Participation in County Option Program [Filed: 03/03/2025; D.I. [794](#)].
- D. Order Approving Settlement with County of Hudson Regarding Debtors' Continued Participation in County Option Program [Filed: 03/10/2025; D.I. [916](#)].**

Objection Deadline: February 18, 2025 at 4:00 p.m.

Responses: None.

Status: **An Order has been entered. This matter will not go forward.**

4. Debtors' Fourth Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/18/2025; D.I. [710](#)].

Related Documents:

- A. Certification of No Objection Regarding Debtors' Fourth Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/10/2025; D.I. [899](#)].
- B. Order Approving Debtors' Fourth Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date [Filed: 03/10/2025; D.I. 918].

Objection Deadline: March 4, 2025 at 4:00 p.m.

Responses: None.

Status: An Order has been entered. This matter will not go forward.

III. UNCONTESTED MATTERS GOING FORWARD

5. Motion of Amandeep Kaur Singh and Jaspal Chatrath for Entry of an Order Granting Relief from Automatic Stay [Filed: 02/04/2025; D.I. [642](#)].

Related Documents:

- A. Certification of Counsel Regarding Stipulation By and Between the Debtors and Amandeep Kaur Singh and Jaspal Chatrath for Relief from Stay [Filed: 03/11/2025; D.I. [924](#)].
- B. Order Approving Stipulation By and Between the Debtors and Amandeep Kaur Singh and Jaspal Chatrath Resolving Motion for Relief from the Automatic Stay to Continue Pending Litigation [Filed: 03/11/2025; D.I. [927](#)].

Objection Deadline: February 18, 2025 at 4:00 p.m. The objection deadline has been extended indefinitely based on an agreement in principle as to a resolution of the motion.

Responses: None.

Status: An Order has been entered. This hearing will not go forward.

6. Motion of Yvette Otero for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [Filed: 02/20/2025; D.I. [714](#)].

Related Documents:

Objection Deadline: March 5, 2025 at 4:00 p.m. The objection deadline has been extended based on an agreement in principle as to a resolution of the motion.

Responses:

- A. Limited Objection to Motion of Yvette Otero for Relief from the Automatic Stay to Continue Pending Litigation [Filed: 03/11/2025; D.I. [955](#)].

Additional Documents:

- B. **Certification of Counsel Regarding Stipulation By and Between the Debtors and Yvette Otero for Relief from Stay** [Filed: 03/16/2025; D.I. [992](#)].

Status: **A Certification of Counsel has been filed. No hearing is necessary unless required by the Court.**

7. Application of HCA-Information Technology & Services, Inc. d/b/a Cerecore for Allowance and Payment of Administrative Claim Pursuant to 11 U.S.C. § 503(b)(1) [Filed: 02/18/2025; D.I. [705](#)].

Related Documents: None.

Objection Deadline: March 4, 2025 at 4:00 p.m. An indefinite extension has been granted while the parties discuss a potential resolution of this matter.

Responses:

- A. Debtors' Objection to Application of HCA-Information Technology Services, Inc. d/b/a Cerecore for Allowance of Administrative Claim [Filed: 03/11/2025; D.I. [954](#)].

Status: The parties are in discussions regarding a potential resolution of this matter. In the absence of a resolution, this matter is going forward.

IV. CONTESTED MATTERS

8. Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

Related Documents:

- A. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- B. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- C. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- D. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)].
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)].
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)].
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)].
- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 02/14/2025; D.I. [702](#)].
- I. **Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 03/14/2025; D.I. [988](#)].**

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- J. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].
- K. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- L. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].
- M. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)].
- N. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)].

Status: **An Order has been entered** authorizing further interim financing through April 4, 2025. **This matter will not go forward.**

- 9. Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the

Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].

- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See [8A](#).)
- C. Interim Order (A) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].
- D. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See [8C](#))
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)]. (See [8D](#))
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)]. (See [8F](#))
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)]. (See [8G](#))
- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 02/14/2025; D.I. [702](#)]. (See [8H](#))
- I. **Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 03/14/2025; D.I. [988](#)]. (See [8I](#))**

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- J. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See [8J](#))
- K. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- L. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See [8K](#))

- M. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See 8I)
- N. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)]. (See 8M)
- O. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)]. (See 8N)

Status: **An Order has been entered** authorizing further interim financing through April 4, 2025. **This matter will not go forward.**

- 10.** Motion of Saint Peter's University Hospital for an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/13/2024; D.I. [300](#)].

Related Documents: None.

Objection Deadline: December 27, 2024 at 4:00 p.m. (ET)

Objections Received:

- A. Debtors' Limited Objection to Saint Peter's University Hospital's Motion for Entry of an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/27/2024; D.I. [372](#)].

Status: The parties have agreed that this matter should be continued.

- 11.** Debtors' First Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 12/27/2024; D.I. [374](#)].

Related Documents:

- A. Order Approving Debtors' First Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date [Filed: 02/12/2025; D.I. [687](#)].

Objection Deadline: January 10, 2025 at 4:00 p.m. (ET). The objection deadline was extended to January 31, 2025 at 4:00 p.m. (ET) for Mazuma Capital Corp.

Responses:

- B. Mazuma Capital Corp's Limited Objection to Debtors' First Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases and Reservation of Rights [Filed: 01/31/2025; D.I. [612](#)].

Additional Documents:

- C. **Certification of Counsel Regarding First Omnibus Order Authorizing Debtors to Reject Certain Executory Contracts and Unexpired Leases** [Filed: 03/17/2025; D.I. [994](#)].

Status: **A Certification of Counsel has been filed. No hearing is necessary unless required by the Court.**

- 12.** Debtors' Second Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/18/2025; D.I. [708](#)].

Related Documents: None.

Objection Deadline: March 4, 2025 at 4:00 p.m.

Responses:

- A. Objection and Reservation of Rights of Access Information Management Corporation to Debtors' Second Omnibus Motion for Entry of an Order

Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/28/2025; D.I. [783](#)].

- B. Objection by the FME Entities to Debtors' Second Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [817](#)].

Status: Debtors have reached a general resolution as to Access regarding appropriate language for the order on the Motion. This matter is going forward as to FME and all other counterparties.

- 13.** Debtors' Third Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/18/2025; D.I. [709](#)].

Related Documents: None.

Objection Deadline: March 4, 2025 at 4:00 p.m.

Responses:

- A. Limited Objection and Reservation of Rights of SCG Capital Corporation with Respect to Debtors' Third Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [816](#)].
- B. Mazuma Capital Corp's Objection to Debtors' third Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [826](#)].
- C. Withdrawal of Limited Objection and Reservation of Rights of SCG Capital Corporation with Respect to Debtors' Third Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/11/2025; D.I. [932](#)].

Additional Documents:

- D. **Certification of Counsel Regarding Third Omnibus Order Authorizing Debtors to Reject Certain Executory Contracts and Unexpired Leases** [Filed: 03/17/2025; D.I. [995](#)].

Status: A Certification of Counsel has been filed. No hearing is necessary unless required by the Court.

- 14.** Initial Pretrial Conference with respect to CarePoint Health Systems, Inc., d/b/a Just Health Foundation, et al. v. BMC Hospital LLC, et al., Adversary Proceeding No. 24-50296-JKS

Related Documents:

- A. Amended Complaint Seeking Extension of the Automatic Stay Under 11 U.S.C. § 362(a) and for Injunctive Relief Pursuant to 11 U.S.C. § 105(a) [Filed: 12/24/2024; Adv. D.I. [4](#)].
- B. Debtors' Amended Motion for Preliminary Injunction and Temporary Restraining Order Pursuant to 11 U.S.C. § 105(a) and/or for an Extension of the Automatic Stay Pursuant to Section 362(a) of the Bankruptcy Code [Filed: 12/24/2024; Adv. D.I. [5](#)].
- C. Debtors' Reply in Support of Amended Motion for Preliminary Injunction and Temporary Restraining Order Pursuant to 11 U.S.C. § 105(a) and/or for an Extension of the Automatic Stay Pursuant to Section 362(a) of the Bankruptcy Code [Filed: 01/17/2025; Adv. D.I. [9](#)].
- D. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Filed: 02/04/2025; Adv. D.I. [12](#)].
- E. Order Approving Stipulation Resolving Objection of Defendants Dr. Marc Goldstein and CD&R Realty, LLC to Debtors' Amended Motion for Preliminary Injunction and a Temporary Restraining Order, and Extending Defendants' Deadline to Respond to the Amended Complaint [Filed: 02/24/2025; Adv. D.I. [16](#)].

Objection Deadline: February 13, 2025 at 4:00 p.m.

Responses:

- F. Defendants' [CD&R Realty, LLC and Dr. Marc Goldstein] Brief in Response and Opposition to Debtors' Motion for Preliminary Injunction and Temporary Restraining Order Pursuant to 11 U.S.C. § 105(A) and/or for an Extension of the Automatic Stay Pursuant to Section 362(a) of the Bankruptcy Code [Filed: 12/27/2024; Adv. D.I. [6](#)].
- G. Answer of Vijayant Singh, In his Capacity as Relator, to Amended Complaint Seeking Extension of the Automatic Stay Under 11 U.S.C. § 362(a) and for Injunctive Relief Pursuant to 11 U.S.C. § 105(a) [Filed: 02/20/2025; Adv. D.I. [14](#)].

Additional Documents:

H. [Revised Proposed] Order Granting Debtors' Amended Motion for Preliminary Injunction and a Temporary Restraining Order [Filed: 03/10/2025; Adv. D.I. [17](#)].

Status: This matter is going forward.

Dated: March 17, 2025

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603
Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors